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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 PANTALION LOPEZ-ZAVALA,
15 Defendant.

CASE NO. 1:23-CR-00153-JLT-SKO
STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER
DATE: 10/18/2023
TIME: 1:00 p.m.
COURT: Hon. Sheila K. Oberto

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17 BACKGROUND

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status conference on 10/18/2023.
21 2. By this stipulation, defendant now moves to continue the status conference until
22 1/17/2024, and to exclude time between 10/18/2023, and 1/17/2024, under 18 U.S.C. § 3161(h)(7)(A), B
23 (i), (iv).
24 3. The parties agree and stipulate, and request that the Court find the following:
25 a) The government has represented that the discovery associated with this case
26 includes recorded communications, cellphone extractions, investigative reports, and various
27 media evidence.
28 b) Counsel for defendant desires additional time consult with her client, review the

voluminous discovery, conduct independent investigation, and pursue a potential pretrial resolution of the case.

- c) The government plans to make a plea offer before the next status conference.
 - d) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking account the exercise of due diligence.
 - e) The government does not object to the continuance.
 - f) Based on the above-stated findings, the ends of justice served by continuing the requested outweigh the interest of the public and the defendant in a trial within the al date prescribed by the Speedy Trial Act.
 - g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, , within which trial must commence, the time period of 10/18/2023 to 1/17/2024, ve, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i) and (iv) because to grant the continuance would deny the defendant reasonable time to obtain counsel, unreasonably deny the defendant or the Government continuity of counsel, or would deny el for the defendant or the attorney for the Government the reasonable time necessary for ve preparation, taking into account the exercise of due diligence.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: September 29, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ JUSTIN J. GILIO
JUSTIN J. GILIO
Assistant United States Attorney

1 Dated: October 4, 2023

/s/ Alekxia Torres Stalling

2 Alekxia Torres Stalling

3 Counsel for Defendant

4 Pantalion Lopez-Zavala

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7 IT IS SO ORDERED.

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12 DATED: 10/11/2023

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Sheila K. Oberto

THE HONORABLE SHEILA K. OBERTO
UNITED STATES MAGISTRATE JUDGE